

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17-232-EGS

UNOPPOSED MOTION FOR ORDER PERMITTING CHRISTMAS TRAVEL

In this Court's August 16, 2019, order granting Michael T. Flynn's "Mr. Flynn" motion to travel within the continental United States, the Court directed Mr. Flynn to seek explicit permission from this Court to travel abroad. Therefore, Mr. Flynn, by and through his counsel, respectfully requests this Court issue an order for the return of Mr. Flynn's passport and to approve his travel to the Republic of Korea over the Christmas holiday, in compliance, coordination, and with the permission of his Pre-Trial Services Officer.

1. Mr. Flynn has family currently residing in the Republic of Korea—the details of which have been provided to his pretrial services officer. Mr. Flynn traveled to South Korea after his appearance before this Court last December and returned on approximately the same schedule proposed here.

2. Mr. Flynn asks the Court to permit him to fly to Korea on December 21, 2019, and return on January 7, 2020. He will stay with family in their home.

3. Molly McCann will be available to pick up Mr. Flynn's passport from the E. Barrett Prettyman Courthouse as soon as the Court approves this motion.

4. As noted in the Motion for Order Clarifying Travel Parameters, Dkt. 102, it is

beyond dispute that Mr. Flynn poses no risk of flight. He has been effectively on probation for close to two years; he has traveled to Korea and back, and he surrendered his passport upon request.

5. Mr. Flynn has served his country with the greatest distinction for thirty-three years, including five years in actual combat on missions. He can be counted on to complete his travel plans as detailed above and to return his passport upon his return.

6. The government did not oppose his travel last year, and it does not oppose this request.

7. For these reasons, Mr. Flynn requests that this Court enter an order granting the return of Mr. Flynn's passport and approving his travel to South Korea over the Christmas holiday and New Year.

Dated: December 2, 2019

Respectfully submitted,

/s/ Sidney Powell

/s/ Jesse R. Binnall

Jesse R. Binnall
Jesse R. Binnall, VSB # 79292
Lindsay R. McKasson
Harvey & Binnall, PLLC
717 King Street, Suite 300
Alexandria, VA 22314
Tel: (703) 888-1943
jbinnall@harveybinnall.com

Sidney Powell
Molly McCann
Sidney Powell, P.C.
2911 Turtle Creek Blvd., Suite 300
Dallas, Texas 75219
Tel: (214) 07-1775
sidney@federalappeals.com
Admitted Pro Hac Vice

W. William Hodes
The William Hodes Law Firm
3658 Conservation Trail
The Villages, Florida 32163
Tel: (352) 399-0531
wwh@hodeslaw.com
Admitted Pro Hac Vice

CERTIFICATE OF CONFERENCE

Undersigned counsel conferred by email today with Mr. Van Grack and Ms. Ballentine who advised that the government does not oppose this motion to allow Mr. Flynn's travel to Korea for the holidays.

/s/Sidney Powell
Sidney Powell, P.C.
2911 Turtle Creek Blvd.,
Suite 300
Dallas, Texas 75219
Tel: 214-707-1775
sidney@federalappeals.com
Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2019, a true and genuine copy of Mr. Flynn's Unopposed Motion for Order Permitting Christmas Travel was filed using the Court's CM/ECF system, which will serve a copy of the filing upon all counsel of record.

Jessie K. Liu, U.S. Attorney for the District of Columbia
Brandon L. Van Grack, Special Assistant U.S. Attorney
Jocelyn Ballantine, Assistant U.S. Attorney
555 4th Street, NEW Washington, D.C. 20530

/s/Sidney Powell
Sidney Powell, P.C.
2911 Turtle Creek Blvd.,
Suite 300
Dallas, Texas 75219
Tel: 214-707-1775
sidney@federalappeals.com
Admitted *Pro Hac Vice*

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17-232-EGS

ORDER GRANTING MOTION PERMITTING CHRISTMAS TRAVEL

Michael T. Flynn “Mr. Flynn” requested this Court return his passport and grant him leave to travel to the Republic of Korea from December 21, 2019, to January 7, 2020.

Mr. Flynn’s motion is GRANTED.

THE COURT ORDERS the return of Mr. Flynn’s passport and approves his travel to the Republic of Korea over the Christmas holiday.

Date: _____

The Honorable Emmet G. Sullivan, Jr.
United States District Judge